T - Mobile

Garnet.Hanly@T-Mobile.com Senior Corporate Counsel 401 9th Street, NW, Suite 550 Washington, D.C. 20004 Direct Dial: 202-654-5908 Mobile: 703-930-9631

March 13, 2009

Mr. Gary Evenson Administrator Telecommunications Division Wisconsin Public Service Commission 610 North Whitney Way Madison, Wisconsin 53707

RE: T-Mobile Central LLC, d/b/a T-Mobile (#8211) – 2008 Commercial Mobile Radio Service Providers Annual Report

Dear Mr. Evenson:

The Wisconsin Public Service Commission ("Commission") has requested that T-Mobile Central LLC, d/b/a T-Mobile ("T-Mobile") file a Commercial Mobile Radio Service ("CMRS") Providers Annual Report with the Commission by April 1, 2009.

Although T-Mobile has complied with Commission annual report and data filing requests over the past several years, we continue to assert the Commission has no authority to require the filing of a 2008 CMRS Providers Annual Report. T-Mobile objects to this request pursuant to W.S.A. Section 196.01(b)4, which expressly excludes CMRS providers from the definition of a "public utility;" and W.S.A. Sections 196.02 and 196.202, which limit the Commission's jurisdictional reach over CMRS providers from seeking such information.

Subject to and without waiving the reservations noted above, T-Mobile hereby submits its responses to the CMRS 2008 Annual Report as requested via T-Mobile Central LLC (#8211) along with the request for confidential treatment of intrastate revenue information provided in the report. T-Mobile is submitting this information via electronic filing in accordance with the procedures provided by Commission staff. Please note that T-Mobile is requesting confidential treatment of its intrastate revenues on the basis that the information is proprietary and a trade secret and protectable from disclosure. T-Mobile also notes that the Commission has previously granted T-Mobile's request for confidential treatment of such information in previous year's reports.

As a final matter, we request that you update the regulatory contact information for T-Mobile. Please forward any correspondence related to Commission matters to:

Garnet M. Hanly Senior Corporate Counsel T-Mobile 401 9th Street, NW, Suite 550 Washington, DC 20004 Office: (202) 654-5908

Mobile: (703) 930-9631

If you have any questions concerning this matter, please contact me.

Regards,

Garnet M. Hanly

STATE OF WISCONSIN

PUBLIC UTILITY COMMISSION

| PETITION OF T-MOBILE ON BE WHOLLY OWNED SUBSIDIARY CENTRAL FOR CONFIDENTIAL AND PROPRIETARY TREATME OF ITS 2008 CMR REPORT | T-MOBILE |)))) | |
|--|-----------------|------------------|--|
| AFFI | DAVIT OF GAR | NET HANLY | |
| WASHINGTON DISTRICT OF COLUMBIA |)) SS:) | | |

Garnet Hanly, being first duly sworn on oath, deposes and states as follows:

- T-Mobile on behalf of its wholly owned subsidiary (the "Petitioner") are wireless telecommunication providers in Wisconsin and are filing a 2008 CMR Report.
- 2. I am a Senior Corporate Counsel for T-Mobile and in this capacity I have personal knowledge of all relevant matters pertaining to this Petition and I am authorized to make this affidavit on behalf of Petitioners.
- T-Mobile is requesting confidential treatment for its filing of intrastate revenues of its 2008 CMR Report.
- 4. The intrastate revenues of T-Mobile are proprietary information that would aid competitors of T-Mobile.

- 5. This intrastate revenue information is protectible from disclosure pursuant to Wisconsin law §19.36(5) and §134.90.
- T-Mobile considers its intrastate revenue as a trade secret protectible from public disclosure.
- 7. The intrastate revenues of T-Mobile in the State of Wisconsin are indicative of T-Mobile's market share and competitive position. Knowledge of T-Mobile' intrastate revenues by competitors provides to said competitors independent economic value. If this information was to become generally known or readily ascertainable to other entities with whom T-Mobile competes, this knowledge would provide considerable advantage for future competitive situations and planning.
- 8. T-Mobile would be prejudiced and suffer competitive harm from public disclosure of its intrastate revenue data.
- T-Mobile Wisconsin intrastate revenue is not generally known or readily ascertainable by T-Mobile's competitors who could obtain economic value from its disclosure or use.
- 10. Gross revenue information is only provided to senior management and a restricted list of employees who have a particular need to know the state specific revenues. It is not disclosed to other employees of T-Mobile and is protected internally by T-Mobile as proprietary trade secret information.
- 11. The intrastate revenue of T-Mobile is information that would aid competitors of T-Mobile providing information as to market penetration and market growth and therefore is protectible from disclosure and information which comprise trade secrets protectible from public disclosure.

| Dated at WAShington C, this 13th da | ay of March, 2009. |
|-------------------------------------|--------------------|
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| Gar | rnet Hanly |

Subscribed and sworn before me this 13 day of March, 2009

Notary Public State of DIJULT 01 Culumbia

My Commission Expires Olacland



Public Service Commission of Wisconsin (8211) - T-MOBILE CENTRAL LLC Commercial Mobile Radio Service Provider Annual Report For Year Ending December 31, 2008

Rules for Reporting Assessable Revenue Definitions Help

| 4026 | Help |
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| * - indicates required field | S |
| | son responsible for accounts; that I have examined the following report and, to the ormation and belief, it is a correct statement of the business and affairs of said ed by the report in respect to each and every matter set forth therein. |
| Utility N | Name: T-MOBILE CENTRAL LLC |
| The state of the s | ounts: Jeni Wilcox |
| Title of person responsi | punts: Paralegal * |
| | Date: 03/24/2009 * (mm/dd/yyyy) |
| Identification | |
| Utility N | lame: T-MOBILE CENTRAL LLC |
| Street Add | dress: 12920 SE 38TH STREET * |
| PC | Box: PO Box Zip: |
| | City: BELLEVUE * State: WA * Zip: 98006-0000 * |
| Web Site Add | dress: WWW.T-MOBILE.COM |
| Business Customers P | hone: Example 6085551212 Ext: |
| Residential Customers P | hone: Example 6085551212 Ext: |
| Primary Address - P | rimary Utility Contact (located at utility address) |
| | ame: Garnet Hanly |
| | Title: Senior Corporate Counsel |
| Firm/Com | pany: T-Mobile USA, Inc. |
| Office Add | ress: 401 9th Street, NW, Suite 550 |
| PC | D Box: PO Box Zip: |
| | City: Washington * State: DC * Zip: 20004 * |
| Fax Nur | nber: Example 6085551212 |
| Phone Nur | nber: 2026545908 * Example 6085551212 |
| Email Add | ress: garnet.hanly@t-mobile.com |
| Annual Report Cont | act - Contact Person for Information Contained in This Annual Report |
| Same As Primary Addre | ess |
| N | ame: Jeni Wilcox |
| | Title: Paralegal * |
| Firm/Comp | pany: T-Mobile USA, Inc. |
| Office Add | ress: 12920 SE 38th Street |
| | |

| PO Box | : | PO Box Zip: | | |
|---|---|--------------------|--------------------|----------------------|
| City: | Bellevue | | * State: WA | * 7in. 98006 |
| Sections 4 Care | 4253833640 | Example 608555 | | Zip. 130000 |
| Phone Number: | 4253836377 | | | |
| Email Address: | jeni.wilcox@t- | | | |
| Regulatory Contact - cor | ntact Person fo | or Regulatory Inc | uiries and Comr | plaints |
| Same As Primary Address | | | | vianits |
| Name: | | | | |
| Title: | | | | |
| Firm/Company: | | - | | |
| Office Address: | | | | * |
| PO Box: | | PO Box Zip: | | |
| City: | | | * State: | * Zip: |
| Fax Number: | | Example 608555 | | |
| Phone Number: | | Example 608555 | | |
| Email Address: | | | | |
| 1b) If not, do you intend to prov2) Do you believe that this year Commission?2a) If yes, provide particulars co line number and dollar amounter | 's CMRS revenu | es have already be | en reported to the | 1,4 (1)14) |
| | | | | A |
| 2b) If no, provide your assessabl assessment purposes. Wisconsin Gross Intrastate O | perating Teleco | | | (000's) |
| Wisconsin Gross Intrastate O | perating Teleconable) | mmunications Serv | ice Revenue | Can |
| Wisconsin Gross Intrastate O Annual Report Notes (if application Answer to 2b is being submitted Commission. Please print this report | perating Teleconable) via a request for | mmunications Serv | ment to the Wisco | onsin Public Service |

Print Check for Errors & Submit